

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LA ANTONETTE ANDERSON,)	
)	
Plaintiff,)	
)	Case No.: 1:15-cv-0725
v.)	
)	Hon. Robert J. Jonker
HAWORTH, INC.,)	
)	
Defendant.)	
)	

**DEFENDANT HAWORTH, INC'S RESPONSE
TO PLAINTIFF'S MOTION FOR RECUSAL**

On January 31, 2017, Plaintiff filed a letter request that this Court has construed as a motion for recusal. (ECF No. 43.) In her motion, Plaintiff notes this Court's former ties to defense counsel, Warner Norcross & Judd, LLP ("WNJ"), and asks the Court to recuse itself from this case. (*Id.*)

On February 7, 2017, this Court issued an Order allowing Haworth to file a response to Plaintiff's motion. (ECF No. 44.) In its Order, the Court expressed an interest in learning whether any facts or work associated with the case occurred before July 2007. (*Id.*)

Haworth takes no position on Plaintiff's motion, instead entrusting the decision entirely to the Court's sound judgment and discretion. The simple answer to the court's inquiry, however, is "no." No work was performed on this case before July 2007. This is a failure-to-hire case arising out of Plaintiff's job application with Haworth. (*See* ECF No. 1, at ¶3.) Plaintiff submitted her application to Haworth in June 2013. (*See* ECF No. 40-3 at 59.) Accordingly, the facts and circumstances of this lawsuit did not begin developing until June 2013 at the earliest.

Additionally, and before filing an appearance in this matter, defense counsel ran a search of its conflicts database to determine whether Plaintiff was ever a client or adversary of WNJ prior to this case. She was not.

CONCLUSION

No facts or work associated with this case occurred before July 2007. Nor did Plaintiff have any contact as a client or adversary of WNJ prior to this lawsuit. While Haworth does not doubt this Court's impartiality, it takes no position on Plaintiff's motion.

Dated: February 15, 2017

s/ C. Ryan Grondzik

Andrea J. Bernard

C. Ryan Grondzik

WARNER NORCROSS & JUDD LLP

900 Fifth Third Center

111 Lyon Street, N.W.

Grand Rapids, Michigan 49503-2487

616.752.2000

abernard@wnj.com

Attorney for Defendant Haworth, Inc.